

**RANDAZZA**  
LEGAL GROUP

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**25 March 2024**

Via Electronic Filing and E-Mail

Hon. Cathy Seibel  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150  
<chambersnysdseibel@nysd.uscourts.gov>

***Re: Project Veritas, et al. v. James O'Keefe, et al., No. 7:23-cv-04533  
Joint Status Report***

Dear Judge Seibel,

On January 9, 2024 (ECF No. 32), the Court endorsed the motion seeking an order referring the case to a Magistrate Judge for settlement purposes. In so doing, the Court stayed deadlines pending the discussions and ordered the parties to “provide a joint status update no later than 3/11/24.” A status report indicating that the settlement conference was to occur on March 18, 2024, was filed March 11, 2024 (ECF No. 36), whereupon the Court ordered a further joint status update by March 25, 2024 (ECF No. 37). The parties update the Court as follows:

The settlement conference before the Hon. Andrew E. Krause took place on March 18, 2024. Agreements were reached with Defendants Anthony Iatropoulos and R.C. Maxwell, with draft written settlement agreements for each now in progress.

No agreement was reached between Plaintiffs Project Veritas and Project Veritas Action Fund and Defendants James O’Keefe and O’Keefe Media Group.

The parties request the stay be lifted and dates be set for the non-settling defendants to respond to the operative complaint and for a scheduling conference.

Respectfully Submitted,

/s/ Jay M. Wolman  
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cc: Counsel of Record (Via ECF)